

## MARINO, TORTORELLA &amp; BOYLE, P.C.

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March 21, 2025

**VIA ECF**

Honorable Brian R. Martinotti, U.S.D.J.  
United States District Court  
District of New Jersey  
U.S. Post Office & Courthouse  
2 Federal Square  
Newark, NJ 07102

Re: *In re: Insulin Pricing Litigation*, No. 2:23-md-03080-BRM-RLS  
MDL No. 3080 | Bi-weekly status report

Dear Judge Martinotti:

Pursuant to CMO #5, the parties provide the following status update for the weeks ending March 14 and March 21:

1. **Ongoing discovery conferrals following March 11 conference with Judge Singh.** In accordance with the Court's ruling during the March 11, 2025 conference before Judge Singh, the parties continued to confer regarding custodians, data sources, and search terms.
2. **Privilege-log protocol.** The parties conferred regarding the privilege-log protocol on March 13, 2025. Plaintiffs provided their positions with respect to various items in the protocol on March 18, 2025, and the parties conferred later that day.
3. **Deposition protocol.** Plaintiffs are continuing to review Defendants' edits to the deposition protocol.
4. **Third-party discovery.** The parties continue to engage in third-party discovery.
5. **SFP Plaintiff Fact Sheets.** Defendants conferred with certain Plaintiffs in the SFP Track regarding their Plaintiff Fact Sheets responses and document productions.
6. **Defendants' request to amend PFS Implementation Order in SFP Track.** Defendants filed a request to amend CMO 14 on March 12, 2025 (ECF No. 464). SFP Track Plaintiffs filed their response on March 19, 2025 (ECF No. 470).
7. **State AG Track Disclosures.** Defendants conferred with certain Plaintiffs in the AG Track regarding Departments, Agencies, or Offices (DAO) disclosures required under CMO No. 11.

For the Court's reference, the parties enclose a current list of motions pending before Your Honor.

Thank you for your continuing attention to this matter.

Respectfully submitted,

/s Matthew F. Gately

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Enclosures

cc: Honorable Rukhsanah L. Singh, U.S.M.J.  
All counsel of record